



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Maria Chappelle-Nadal

**AUG 23 2018**

University City, Missouri 63130

*maria.chappellenadal@gmail.com*

RE: MUR 7106  
Maria Chappelle-Nadal  
Citizens for Maria Chappelle-Nadal  
and Deandress Green in her official  
capacity as treasurer

Dear Ms. Chappelle-Nadal:

On August 16, 2018, the Federal Election Commission accepted the signed conciliation agreement submitted by you on behalf of yourself and Citizens for Maria Chappelle-Nadal in settlement of a violation of 52 U.S.C. § 30125(e), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

Documents related to the case will be placed on the public record within 30 days. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). Information derived in connection with any conciliation attempt will not become public without the written consent of you and the Commission. *See* 52 U.S.C. § 30109(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the first installment of the civil penalty is due within 30 days of the conciliation agreement's effective date, which is August 23, 2018. Thus, \$5,000 is due September 22, 2018. The remaining \$10,000 is due 90 days after that, December 21, 2018. If you have any questions, please contact me at (202) 694-1548.

Sincerely,

Elena Paoli  
Attorney

Enclosure  
Conciliation Agreement

OFFICE OF  
GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

2018 JUN 17 AM 9: 56

In the Matter of )  
 ) MUR 7106  
Maria Chappelle-Nadal )  
Citizens for Maria Chappelle-Nadal )  
and Deandress Green in her official )  
capacity as treasurer )

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Michelle C. Clay. The Federal Election Commission ("Commission") found reason to believe that Maria Chappelle-Nadal and Citizens for Maria Chappelle-Nadal and Deandress Green in her official capacity as treasurer (collectively, "Respondents") violated 52 U.S.C. § 30125(e)(1)(B).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 52 U.S.C. § 30109(a)(4)(A)(i):

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Maria Chappelle-Nadal is a Missouri State Senator and was a 2016 candidate for Missouri's First Congressional District.

2. Citizens for Maria Chappelle-Nadal is Chappelle-Nadal's state candidate committee.

3. On October 29, 2015, Chappelle-Nadal became a federal candidate. She was already a Missouri State Senator and she maintained her seat during the time she was a federal candidate.

4. Citizens for Maria Chappelle-Nadal remained active while Chappelle-Nadal campaigned for the U.S. House of Representatives.

5. Missouri allows state candidates to receive contributions that would be impermissible under the Federal Election Campaign Act of 1971, as amended ("the Act"); for example, under Missouri law, corporations and labor unions can make contributions to candidates and, prior to December 2016, there were no contribution limits. Respondents accepted contributions from corporations and labor unions and accepted contributions in amounts above the contribution limits stated in the Act.

6. State disclosure reports reveal that, after Chappelle-Nadal became a federal candidate on October 29, 2015, Citizens for Maria Chappelle-Nadal disbursed \$104,006.58 to state and local Missouri candidates and state and local chapters of the Democratic Party.

7. The Act prohibits federal candidates, federal officeholders, their agents, and entities established, financed, maintained, or controlled ("EFMC'd") by federal candidates or officeholders from soliciting, receiving, directing, transferring, or spending funds in connection with any election other than an election for Federal office unless the funds are in amounts and from sources permitted by the Act. 52 U.S.C. § 30125(e)(1)(B); 11 C.F.R. § 300.62.

8. Chappelle-Nadal, a federal candidate as of October 29, 2015, directly EFMC'd Citizens for Maria Chappelle-Nadal, which donated to state and local candidates and parties, thus

transferring or spending funds in connection with a nonfederal election. Therefore, any funds that Citizens for Maria Chappelle-Nadal transferred or spent after Chappelle-Nadal became a federal candidate and before her August 2, 2016 defeat were subject to the amount and source limitations of the Act.

9. State disclosure reports reveal that Citizens for Maria Chappelle-Nadal accepted contributions from corporations and labor unions and from individuals in amounts greater than permitted by the Act. Thus, some portion of the \$104,006.58 disbursed to state and local recipients after Chappelle-Nadal became a federal candidate were funds that did not comply with the Act's amount limitations and source prohibitions.

10. Respondents contend that all contributions received and spent by Citizens for Maria Chappelle-Nadal were permissible under Missouri law at that time.

V. Respondents transferred and spent impermissible funds after Chappelle-Nadal became a federal candidate, in violation of 52 U.S.C. § 30125(e)(1)(B). Respondents will cease and desist from violating 52 U.S.C. § 30125(e)(1)(B).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Fifteen Thousand Dollars (\$15,000), pursuant to 52 U.S.C. § 30109(a)(5)(A). The civil penalty will be paid as follows:

- a. A payment of Five Thousand Dollars (\$5,000) is due no more than thirty (30) days from the date this Agreement becomes effective;
- b. Thereafter, a payment of Ten Thousand Dollars (\$10,000) is due no more than ninety (90) days from the due date of the initial payment.

c. In the event that any payment is not received by the Commission by the fifth day after it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the Respondents. Failure by the Commission to accelerate the payments with regard to any overdue payment shall not be construed as a waiver of its right to do so with regard to further overdue payments.

VII. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral,

made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

BY: Kathleen Guith  
Kathleen Guith  
Associate General Counsel for Enforcement

8/23/18  
Date

FOR THE RESPONDENTS:

Maria Chappelle-Nadal  
Maria Chappelle-Nadal

7/10/2018  
Date